LaJuana S. Wilcher Secretary

AIR QUALITY PERMIT

Ernie Fletcher Governor

Issued under 401 KAR 52:030 Federally-enforceable Permits for Nonmajor Sources



Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

Permittee Name: Federal-Mogul Friction Products

Mailing Address: 2540 Old Gallatin Road, Scottsville, KY 42164

is authorized to operate automobile brake block manufacturing facility.

Source Name: Federal-Mogul Corporation

Mailing Address: 2540 Old Gallatin Road, Scottsville, KY 42164

Source Location: Same as above

KYEIS ID #: 21-003-00009 SIC Code: 3714 Log Number: 53540 County: Allen

AI Number: 17 Activity #: APE 20040001

Permit Number: F-04-041 Permit Type: Conditional Major Operating

Regional Office: Bowling Green Application Completion Date: April 1, 2005

1508 Western Avenue Issuance Date: Bowling Green, KY 42104 Expiration Date:

> John S. Lyons, Director Division for Air Quality

DEP7001 (6-97) *Revised: 07/10/03*

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AIOO17 (SOURCE) GENERAL CONDITIONS:

Condition		
No.	Parameter	Condition
L-1	Hazardous Air Pollutants (HAP)	The plant wide emissions of any single HAP with the exception of Phenol, shall not exceed 9 tons per consecutive twelve (12) month period. The plant wide emissions of Phenol shall not exceed 9.5 tons per consecutive twelve (12) month period. The plant wide emissions of any combination of Hazardous Air Pollutants (HAP) <= 22.5 tons/yr.
		The following emission points are subject to the plant wide allowables for HAPs. EP #06 Three (3) Compounders/Mixers EP #07 Printing/Video Jet Ink Area EP #08 Pre-Cure Ovens EP #09 Adhesive Applicator Area. EP #10 Three(3) Bonding Ovens EP #11 Two(2) Form-Cure Ovens
		Compliance Demonstration Method:
		1) For the Compounders/Mixers (EP #04) and Finishing Cells (EP #07) the emission factor in units of pounds emitted per ton total raw material processed are determined for each organic HAP according to the following formula.
		Plant Wide Emission Factor (EF) for individual organic HAPs (lb emitted/ton of raw material processed) = EF for Compounders/Mixers + EF for Pre-Cure Ovens+EF for Adhesive Applicator+ EF for Bonding Oven+ EF for Form-Cure Ovens.
		2) Continued on condition No. L-2
		Preclude Applicability. [401 KAR 52:020] Statistical basis: Twelve-month rolling average (rolling 1-month basis).

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Condition		
No.	Parameter	Condition
L-2	Hazardous Air Pollutants (HAP)	The plant wide emissions of any single HAP with the exception of Phenol, shall not exceed 9 tons per consecutive twelve (12) month period. The plant wide emissions of Phenol shall not exceed 9.5 tons per consecutive twelve (12) month period. The plant wide emissions of any combination of Hazardous Air Pollutants (HAP) <= 9.5 tons/yr
		Compliance Continued
		2)For the Lining Pre- Curing Ovens (EP #08), Adhesive Applicator Area (EP #09) and three Bonding Ovens(EP#10) the emission factor in units of pounds emitted per ton total raw material processed are determined for each organic HAP according to the following formula.
		Plant Wide Emission Factor (EF) for organic HAPs (lb emitted/ton of raw material processed) = EF for Pre-Cure Ovens + EF for Adhesive + Bonding Ovens.
		3) Emission factor for Phenol = 0.0277 lb emitted/ton of total raw material processed. For all other emissions (ink usage, cleaning solvent/ink make-up fluid, and paints), the emission factors were based on material safety data sheet and maximum pollutant content.
		The amount of HAP contained in any material that is used shall be determined from a material safety data sheet. For any material where the MSDS lists a range for the weight fraction of a HAP contained in a material, the highest value shall be used. Under circumstances such that a value for EF cannot be determined from a MSDS or an alternate method of determining an EF is desired, the alternate method must be approved by the Division. The values for EF for each emission point are listed in Table D.2 through Table D.6. If at any time due to a changing of materials used or for any other reason, additional HAP emissions are expected calculations and MSDS shall be submitted to the Division for prior approval.
		Continued on condition No. L-3
		Preclude Applicability. [401 KAR 52:020] Statistical basis: Twelve-month rolling average (rolling 1-month basis).

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	1	
Condition No.	Parameter	Condition
L-3	Hazardous Air Pollutants (HAP)	The plant wide emissions of any single HAP with the exception of Phenol, shall not exceed 9 tons per consecutive twelve (12) month period. The plant wide emissions of Phenol shall not exceed 9.5 tons per consecutive twelve (12) month period. The plant wide emissions of any combination of Hazardous Air Pollutants (HAP) <= 22.5 tons/yr.
		Compliance Continued
		Specific Recordkeeping Requirements:
		The following records shall be maintained.
		 Monthly usage records for all materials containing HAPs. The monthly calculated HAP emissions for each HAP. Consecutive twelve (12) month emission totals for each HAP. The monthly calculated combined HAP emissions. Consecutive twelve (12) month emission totals for combined HAPs.
		Specific Reporting Requirements:
		A report of the consecutive twelve (12) month totals of HAP emissions for each HAP and combined HAPs VOCs shall be submitted every six months in accordance with Condition S-1, Semiannual Reporting. A report of any exceedance of the HAP emissions limitations shall be submitted within thirty days of when the exceedance is determined.
		Preclude Applicability. [401 KAR 52:020] Statistical basis: Twelve-month rolling average (rolling 1-month basis).

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Limitation Requirements:

Condition	D	
No.	Parameter	Condition
L-4	PM10 (Particulate Matter - 10 Microns Or Less)	The plant wide emissions of PM10 (Particulate Matter - 10 Microns Or Less) <= 90 tons/yr.
		Compliance Demonstration Method
		Compliance with this limitation is demonstrated when: the American Air Filter Dust Collector No. 2, Model "C" Fabri-Pulse HEPA on Derivator are operated with a control efficiency of at least 99.7%; the Astrocell-Celebrity 2000 with HEPA filters on Shot Blasting Station are operated properly with a control efficiency of at least 99.97%; The Wheelabrator Jet III, Dust Collector No. 6 on Mixing Area is operated properly with a control efficiency of at least 99.7%;
		Preclude applicability. [401 KAR 52:020] Statistical basis: Twelve-month rolling average (rolling 1-month basis).

Submittal/Action Requirements:

Condition No.	Condition
	Condition
	GEN HANDINAL DEPONTS

S-1 SEMIANNUAL REPORTS:

The permittee shall submit report(s): Due semiannually, by the 30th of January and July to the Regional Office listed on the front of this permit, for the duration of this permit, unless otherwise stated. This report shall be a summary of any monitoring required by this permit, other than continuous emission or opacity monitors. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation. All deviations from permit requirements shall be clearly identified in the reports. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1b (V)1] All reports shall be certified by a responsible official. [401 KAR 52:030, Section 22] Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of 401 KAR 59:005, Section 3(3). [401 KAR 52:030 Section 26, 401 KAR 52:030 Section 22, 401 KAR 59:005 Section 3(3)]

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Submittal/Action Requirements:

Condition	
No.	Condition
S-2	EMISSION EXCEEDANCES:
	The owner or operator shall submit report(s): Due within thirty (30) days of emission related exceedances from permit requirements, including those attributed to upset conditions (other than emission exceedances covered by Requirement D.5); to the Regional Office listed on the front of this permit. Other deviations from permit requirements shall be included in the semiannual reports required by Condition No S-1. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1b (V)(3) and (4)]. [401 KAR 52:030 Section 26]
S-3	PERFORMANCE TEST NOTICE AND REPORT:
	Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by 401 KAR 50:016, Section 1.(1), at least one month prior to the date of any required performance test(s), the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the Division's Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the Division shall be notified of the actual test date at least ten (10) days prior to the test.
	For any performance test(s) required by this permit, the permittee shall submit performance/emission test results: Due within 45 days of the completion of the fieldwork to the Division [Policy Manual of the Division of Air Quality, Section VII.3]. [401 KAR 50:016 Section 1(1)]
S-4	PERMIT EXPIRATION AND REAPPLICATION REQUIREMENTS:
	This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate. The permittee shall submit permit application for renewal: Due at least 180 days prior to permit expiration to the Division. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:030 Section 12]

Narrative Requirements:

Condition No.	Condition	
T-1	SECTION A.	PERMIT AUTHORIZATION. [401 KAR 52:030]

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Narrative Requirements:

Condition	
No.	Condition
T-2	A1. Pursuant to a duly submitted application, the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.
	The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.
	Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency. [401 KAR 52:030]
T-3	SECTION B. SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS. [401 KAR 52:030]
T-4	B1. Compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1b] [401 KAR 52:030 Section 26]
T-5	B2. Particulate Matter emissions, as measured by methods referenced in 401 KAR 50:015 Section 1, shall not exceed the respective limitations specified herein. [401 KAR Chapter 52]
T-6	SECTION C. SOURCE CONTROL EQUIPMENT REQUIREMENTS. [401 KAR 50:055]
T-7	C1. At all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [401 KAR 50:055 Section 2(5)]
T-8	SECTION D. MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS. [401 KAR 52:030]

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Narrative Requirements:

Condition No.	Condition
T-9	D.1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include: a. Date, place (as defined in this permit), and time of sampling or measurements; b. Analyses performance dates; c. Company or entity that performed analyses; d. Analytical techniques or methods used; e. Analyses results; and f. Operating conditions during time of sampling or measurement. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1b (IV)(1)] [401 KAR 52:030 Section 26]
T-10	D.2. Records of all required monitoring data, support information (including calibrations, maintenance records, and original strip chart recordings), and reports required by the Division for Air Quality shall be retained by the permittee for a period of five years. These records shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1b (IV)(2) and Section 1a (7)] [401 KAR 52:030 Section 26]
T-11	 D.3. The permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times: a. To access and copy any records required by the permit; b. To inspect any facility, equipment (including monitoring and air pollution control equipment), practice, or operation; and c. To sample or monitor substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times are defined as during all hours of operation, during normal office hours, or during an emergency. [401 KAR 52:030 Section 3(1)(f)]
T-12	D.4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties. [KRS 77.165, 401 KAR 50:060]
T-13	D.5. The owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows: i) When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown. ii) When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards the permittee shall notify the division as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request. [401 KAR 50:055 Section 1]
T-14	D.6. The permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee. If a KEIS emission report is not mailed to the permittee, comply with all other emission reporting requirements in this permit. [401 KAR 52:030 Section 3(1)(d)]

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Narrative Requirements:

Condition No.	Condition
T-15	D.7. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
	a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:i. The size and location of both the original and replacement units; and
	ii. Any resulting change in emissions;b. The PTE of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
	c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;d. The replacement unit shall comply with all applicable requirements; and
	e. The source shall notify Regional office of all shutdowns and start-ups.
	f. Within six (6) months after installing the replacement unit, the owner or operator shall
	i. Re-install the original unit and remove or dismantle the replacement unit; orii. Submit an application to permit the replacement unit as a permanent change. [401 KAR 52:030 Section 20]
T-16	SECTION E. GENERAL PROVISIONS. [401 KAR 52:030]
T-17	E(a) General Compliance Requirements. [401 KAR 52:030]
T-18	E(a)1. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030 Section 3(1)(b) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to the termination, revocation and reissuance, revision, or denial of a permit. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (2)] [401 KAR 52:030 Section 26]
T-19	E(a)2. Notification by the permittee of a planned change or anticipated noncompliance, or filing of a request for any permit revision, revocation, reissuance, or termination shall not stay any permit condition. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (5)] [401 KAR 52:030 Section 26]

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Narrative Requirements:

Condition No.	Condition
T-20	E(a)3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030 Section 18. The permit will be reopened for cause and revised accordingly under the following circumstances: a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:030 Section 12; b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements; c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (4)] [401 KAR 52:030 Section 26] [401 KAR 50:060 Section 27] [401 KAR 52:030 Section 76], 401 KAR 50:030 Section 26, 401 KAR 50:060 Section 27]
T-21	E(a)4. The permittee shall furnish upon request information requested by the Division to determine compliance with the permit or to determine if cause exists for modifying, revoking and reissuing, or terminating the permit. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Sections 1a (6) and (7)] [401 KAR 52:030 Section 26]
T-22	E(a)5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority. [401 KAR 52:030 Section 7(1)]
T-23	E(a)6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (11)] [401 KAR 52:030 Section 26]
T-24	E(a)7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (3)] [401 KAR 52:030 Section 26]
T-25	E(a)8. Except for requirements identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non Major Sources, Section 1a (12)(b)] [401 KAR 52:030 Section 26]

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Condition	
No.	Condition
T-26	E(a)9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038 Section 3(6). [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (9)] [401 KAR 52:030 Section 26]
T-27	E(a)10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 52:030 Section 11(3)]
T-28	E(a)11. This permit does not convey property rights or exclusive privileges. [Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources, Section 1a (8)] [401 KAR 52:030 Section 26]
T-29	E(a)12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency. [401 KAR 52:030]
T-30	E(a)13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR Chapter 52]
T-31	E(a)14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR Chapter 52]
T-32	E(a)15. Permit Shield – A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with: (a) Applicable requirements that are included and specifically identified in this permit; and (b) Non-applicable requirements expressly identified in this permit. [401 KAR 52:030 Section 11]
T-33	E(a)16. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division. [401 KAR 52:030 Section 3(1)(c)]
T-34	E(a)17. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets. [401 KAR 52:030 Section 8(2)]
T-35	E(a)18. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source. [401 KAR Chapter 51]
T-36	E(b) Permit Revisions. [401 KAR 52:030]

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Narrative Requirements:

Condition No.	Condition	
T-37	E(b)1. Minor permit revision procedures specified in 401 KAR 52:030 Section 14 (3) may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:030 Section 14 (2). [401 KAR 52:030 Section 14(2)]	
T-38	E(b)2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer. [401 KAR 52:030]	
T-39	E(e) Emergency Provisions. [401 KAR 52:030]	
T-40	E(e)1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that: a. An emergency occurred and the permittee can identify the cause of the emergency; b. The permitted facility was at the time being properly operated; c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and, d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. [401 KAR 52:030 Section 23(1)]	
T-41	E(e)2. Notification of the Division does not relieve the source of any other local, state or federal notification requirements. [401 KAR 52:030]	
T-42	E(e)3. Emergency conditions listed in General Provision E(f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement. [401 KAR Chapter 52 Section 23(3)]	
T-43	E(e)4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:030 Section 23(2)]	
T-44	E(f) Risk Management Provisions. [401 KAR Chapter 68]	

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Narrative Requirements:

Condition No.	Condition
T-45 E(f)1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporately CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk	
	RMP Reporting Center P.O. Box 3346 Merrifield, VA, 22116-3346. [401 KAR Chapter 68]
T-46	E(f)2. If requested, submit additional relevant information by the Division or the U.S. EPA. [401 KAR Chapter 68]

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GACT2 (Burners) Emission Points: 03, 05, 12:

Limitation Requirements:

Condition No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have emissions of PT (Particulate Matter) <= 2.34 lbs/hr Compliance Demonstration
		The unit is in compliance with the particulate matter limit while burning natural gas.
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity.
		Compliance Demonstration Method:
		The unit is in compliance with the opacity limit while burning natural gas.
		Limitation. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.

Narrative Requirements:

Applicable Regulations:

Condition No.	Condition
T-1	Applicable Regulations: New process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits particulate emissions. [401 KAR 59:010]

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Narrative Requirements:

Recordkeeping:

Condition No.	Condition	
T-2	Recordkeeping: The permittee shall maintain records of the following: 1) monthly hours of operation and material processing rate; 2) and repairs that were made due to any malfunctions. [401 KAR Chapter 52 Section 10]	
Monitoring:		
Condition		
No.	Condition	
T-3	Monitoring: The permittee shall monitor the amount of material processed on a monthly basis. [401 KAR Chapter 52 Section 10]	
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a monthly basis. [401 KAR Chapter 52 Section 10]	

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GACT3 (Heaters) Emission Points: 14, 15, 16

Insignificant Activities.:

Narrative Requirements:

Condition No.	Condition
T-1	The activities within this group have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030 Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary. [401 KAR 52:030 Section 6]

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GACT4 (Equipment) Emission Points: 001, 002

Shotblast, Deriveters:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have emissions of PT (Particulate Matter) <= 2.34 lbs/hr Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= (monthly processing rate in tons/month)(1 month/hours of operation that month)(emission factor lb PT/ton)(1-control efficiency of 0.997). The Emission Factor for the Shot Blaster= 91.0 lbsPT/ton The Emission Factor for the Deriveters= 0.29 lbs/ton.
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity.
		Compliance Demonstration:
		Refer to Recordkeeping Requirements (T-2) and Monitoring (T-5).
		Limitation. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.
NI 4 :	e Requirements:	

Applicable Regulations:

Condition No.	Condition
T-1	Applicable Regulations: New process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits particulate emissions. [401 KAR 59:010]

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Narrative Requirements:

Recordkeeping:

Condition No.	Condition
T-2	Recordkeeping: The permitee shall maintain records of the following: 1) monthly hours of operation and material processing rate; 2) the monthly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading which exceeded the standard. [401 KAR Chapter 52 Section 10]

Monitoring:

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a monthly basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a monthly basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack monthly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

Federal Mogul Corp Facility Requirements

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GACT5 (Storage) Emission Point: 013:

Limitation Requirements:

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) <= 29.57 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate^0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= (monthly processing rate in tons/month)(1 month/hours of operation that month)(emission factor of 0.023 lb PT/ton)(1-control efficiency of 0.997).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity.
		Compliance Demostration:
		Refer to Recordkeeping Requirements (T-2) and Monitoring (T-5) for the Storage silos.
		Limitation. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.

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Narrative Requirements:

Applicable Regulations:

Condition No.	Condition	
T-1	Applicable Regulations: New process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 and limits particulate emissions. [401 KAR 59:010]	
Recordkeeping:		
Condition No.	Condition	

T-2 Recordkeeping: The permitee shall maintain records of the following:

- 1) monthly hours of operation and material processing rate;
- 2) the monthly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading which exceeded the standard. [401 KAR Chapter 52 Section 10]

Monitoring:

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a monthly basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a monthly basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a monthly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

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GACT6 (Coating System) Emission Point:04,08,09,10,11:

Narrative Requirements:

Hazardous Air Pollutants (HAP):

Condition No.	Condition
T-1	Hazardous Air Pollutants (HAP): Refer to (Source) General Conditions L-1, L-2, and L-3 for Hazardous Air Pollutants (HAP) source-wide limits for HAP emitting points. [401 KAR 52:030 Section 3]

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GACT7 (Mixers) Emission Point:06:

Condition		
No.	Parameter	Condition
L-1	PT (Particulate Matter)	Each unit shall have a maximum emissions of PT (Particulate Matter) <= 4.47 lbs/hr. If the process weight rate for the unit is 1,000 lbs/hr or less, the limit on emissions of particulate matter is 2.34 lb/hr. If the process weight rate for the unit is above 1,000 lbs/hr, the limit on emissions of particulate matter from the unit can be determined (in lbs/hr) by taking the process weight rate for materials introduced into the unit (in tons/hr), raising the process weight rate value to the 0.62 power, and multiplying by 3.59 (maximum = 3.59 x process weight rate^0.62).
		Compliance Demonstration
		Compliance will be demonstrated from the following emission calculation basis and monitoring requirements: PT emission in pounds per hour= (monthly processing rate in tons/month)(1 month/hours of operation that month)(emission factor of 196.3lb PT/ton)(1-control efficiency of 0.997).
		See Monitoring Requirements for monitoring rates and visual inspection of controls. [401 KAR 59:010 Section 3(2)] Statistical basis: Three-hour average.
L-2	Visible Emissions	Each unit shall have Visible Emissions < 20 % opacity.
		Compliance Demonstration:
		Refer to Recordkeeping Requirements (T-2) and Monitoring (T-5) for this unit.
		Limitation. [401 KAR 59:010 Section 3(1)] Statistical basis: Six-minute average.

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Narrative Requirements:

Applicable Regulations:

Condition No.	Condition
T-1 Applicable Regulations: New process operations is applicable to each affected facility associated with a process operation commenced after July 2, 1975 particulate emissions. [401 KAR 59:010]	
Record	dkeeping:
Condition No. Condition	

T-2 Recordkeeping: The permitee shall maintain records of the following:

- 1) monthly hours of operation and material processing rate;
- 2) the monthly log of qualitative visual observation of opacity of emissions and the opacity determined by Reference Method 9, if any were taken, and repairs that were made due to any opacity reading which exceeded the standard. [401 KAR Chapter 52 Section 10]

Monitoring:

Condition No.	Condition
T-3	Monitoring: The permittee shall monitor the amount of material processed on a monthly basis. [401 KAR Chapter 52 Section 10]
T-4	Monitoring: The permittee shall monitor the hours of operation of the unit on a monthly basis. [401 KAR Chapter 52 Section 10]
T-5	Monitoring: The permittee shall perform a qualitative visible observation of the opacity of emissions from each stack on a monthly basis and maintain a log of the observation. If visible emission from a stack are seen, then the opacity shall be determined by EPA Reference Method 9 and an inspection shall be initiated for any necessary repairs. [401 KAR Chapter 52 Section 10]

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GACT8 (Video jet) Emission Point:07:

Narrative Requirements:

Condition No.	Condition
T-1	Monitoring: For plant-wide emissions limits of PM10, single HAPs and Total HAPs, monitoring and recordkeeping requirements, refer to (Source) General Requirements L1 through L4.
Preclude applicability. [401 KAR 52:020]	

Federal Mogul Corp Subject Item Inventory

Activity ID No.: APE20040001

Subject Item Inventory:

ID	Designation	Description
AIOO17	SOURCE	GENERAL CONDITIONS
COMB1	003	Emission Point # 3, Rework brake shoe Debond Oven with After Burner to destroy VOCs. Destruction Efficiency: 99.9% Maximum Capacity: 57.31 lb/hr. Construction Date: 1999.
COMB2	005	Emission Point # 5, New Brake Shoe, After Burner to burn off VOCs and Toxics. Destruction Efficiency: 99.9% Capacity: Furnace: 3 stage: 1st stage: 05 MMBTU/hr and second stage 1.5 MMBTU/hr. and Hanger burn-off at 1.6 MMBTU/hr. Construction Date: 2001
COMB3	012	Emission Point # 12: Lining Manufacturing after burner to destroy VOCs and Toxics. Destruction Efficiency: 99.9% Capacity: 3.0 MMBTU/hr. Construction Date: 2003
COMB4	016	Emission Point # 16, Three Water Heaters and Curing Ovens. Control Device: None Capacity: Furnace: 4.0 MMBTU/hr. Construction Date:2001
COMB5	015	Emission Point # 15, Fifteen Dock Heaters. Control Device: None Capacity: Furnace: 4.05 MMBTU/hr. Construction Date:2001
COMB6	014	Emission Point # 14, Five Make-up Air Heaters Control Device: None Capacity: Furnace: 4.250 MMBTU/hr. Construction Date:2001
EQPT1	001	Emission Point 001, 4 Deriveters Control Device: Dust Collector #2 with HEPA Filters in series. Construction Date: 1993 Rated Capacity:23 tons/hr.
EQPT2	002	Emission Point #2, Shot Blasting Station. Control Device: Dust Collector # 2 with HEPA Filters in series. Construction Date: 1993 Rated Capacity: 23 tons/hr.

Federal Mogul Corp Subject Item Inventory

Activity ID No.: APE20040001

ID	Designation	Description
EQPT3	004	Emission Point #4, Dip Coating System Control Device: None Construction Date: 1993
		Rated Capacity: 23 tons/hr.
EQPT4	006	Emission Point # 006, Three Compound Mixers.
		Control Device: Bin Vent filters, vents indoors. Construction Date: 2001
	I	Capacity: 1.424 tons/hr
EQPT5	011	Emission Point # 011, two Form Cure Ovens. Control Device:Stacks.
		Construction Date:2001
		Capacity:1.425 tons/hr.
EQPT6	007	Emission Point #007, Printing-lining/Video Jet Edge Area.
	•	Control Device: Building Vent. Construction Date:2001
		Capacity:0.063gal/hr.
EQPT7	008	Emission Point # 008, Two Lining Pre-Cure Ovens.
	•	Control Device: Proposed Construction Date: 2001
		Capacity: 1.425 ton/hr.
EQPT8	009	Emission Point # 009, Two Adhesive applicator area.
	1	Control Device: None Construction Date: 2001
		Capacity: 1.425 ton/hr.
EQPT9	010	Emission Point # 010, Three Bonding Ovens.
	ı	Control Device: Stacks. Construction Date: 2001
		Constitution Date: 2001 Capacity: 18.445 ton/hr.

Federal Mogul Corp Subject Item Inventory

Activity ID No.: APE20040001

ID	Designation	Description
STOR1	013	Emission Point # 013, Two Barium Storage Silos. Control Device: Bin Vent Filters. Capacity: 30 tons/hr. Construction Date:2003.

Subject Item Groups:

ID	Description	Components
GACT2	Emission Points: 03, 05, 12	COMB1 Emission Point # 3, Rework brake shoe Debond Oven with After Burner to destroy VOCs.
011011		Destruction Efficiency: 99.9%
		Maximum Capacity: 57.31 lb/hr.
		Construction Date: 1999.
		COMB2 Emission Point # 5, New Brake Shoe, After Burner to burn off VOCs and Toxics.
		Destruction Efficiency: 99.9%
		Capacity: Furnace: 3 stage: 1st stage: 05 MMBTU/hr and second stage 1.5 MMBTU/hr. and Hanger burn-off at
		1.6 MMBTU/hr.
		Construction Date: 2001
		COMB3 Emission Point # 12: Lining Manufacturing after burner to destroy VOCs and Toxics.
		Destruction Efficiency: 99.9%
		Capacity: 3.0 MMBTU/hr.
		Construction Date: 2003
GACT3	Emission Points: 14, 15, 16	COMB4 Emission Point # 16, Three Water Heaters and Curing Ovens.
	Insignificant Activities.	Control Device: None
		Capacity: Furnace: 4.0 MMBTU/hr.
		Construction Date:2001
		COMB5 Emission Point # 15, Fifteen Dock Heaters.
		Control Device: None
		Capacity: Furnace: 4.05 MMBTU/hr.
		Construction Date: 2001
		COMB6 Emission Point # 14, Five Make-up Air Heaters
		Control Device: None
		Capacity: Furnace: 4.250 MMBTU/hr.
		Construction Date: 2001

Federal Mogul Corp Subject Item Inventory

Activity ID No.: APE20040001

ID	Description	Components
GACT4	Emission Points: 001, 002	EQPT1 Emission Point 001, 4 Deriveters
	Shotblast, Deriveters	Control Device: Dust Collector #2 with HEPA Filters in series.
		Construction Date: 1993
		Rated Capacity:23 tons/hr.
		EQPT2 Emission Point #2, Shot Blasting Station.
		Control Device: Dust Collector # 2 with HEPA Filters in series.
		Construction Date: 1993
		Rated Capacity: 23 tons/hr.
GACT5	Emission Point: 013	STOR1 Emission Point # 013, Two Barium Storage Silos.
		Control Device: Bin Vent Filters.
		Capacity: 30 tons/hr.
		Construction Date: 2003.
GACT6	Emission Point:04,08,09,10,11	EQPT9 Emission Point # 010, Three Bonding Ovens.
		Control Device: Stacks.
		Construction Date: 2001
		Capacity:18.445 ton/hr.
		EQPT8 Emission Point # 009, Two Adhesive applicator area.
		Control Device: None
		Construction Date: 2001
		Capacity:1.425 ton/hr.
		EQPT7 Emission Point # 008, Two Lining Pre-Cure Ovens.
		Control Device: Proposed
		Construction Date: 2001
		Capacity:1.425 ton/hr.
		EQPT5 Emission Point # 011, two Form Cure Ovens.
		Control Device:Stacks.
		Construction Date: 2001
		Capacity:1.425 tons/hr.
		EQPT3 Emission Point #4, Dip Coating System
		Control Device: None
		Construction Date: 1993
		Rated Capacity: 23 tons/hr.
GACT7	Emission Point:06	EQPT4 Emission Point # 006, Three Compound Mixers.
		Control Device: Bin Vent filters, vents indoors.
		Construction Date: 2001
		Capacity: 1.424 tons/hr

Federal Mogul Corp Subject Item Inventory

Activity ID No.: APE20040001

ID	Description	Components
GACT8	Emission Point:07	EQPT6 Emission Point #007, Printing-lining/Video Jet Edge Area.
		Control Device: Building Vent.
		Construction Date: 2001
		Capacity:0.063gal/hr.

<u>KEY</u>		
ACTV = Activity	AIOO = Agency Interest	
AREA = Area	COMB = Combustion	
EQPT = Equipment	MNPT = Monitoring Point	
PERS = Personnel	PORT = Transport	
STOR = Storage	STRC = Structure	
TRMT = Treatment		